

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In re : Chapter 13
ANGIE D. VALENTIN, : Bankruptcy No. 18-17497 (AMC)
Debtor. :
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**STIPULATION RESOLVING DEBTOR'S OBJECTIONS TO THE CITY OF
PHILADELPHIA'S PROOF OF CLAIM**

Angie Valentin (the “Debtor”) and the City of Philadelphia (the “City”), to resolve the Debtor’s objection to the City’s Proof of Claim #6-2, hereby agree to this Stipulation Resolving Debtor’s Objections to the City of Philadelphia’s Proof of Claim (the “Stipulation”):

WHEREAS, the Debtor commenced the above-captioned bankruptcy case on November 12, 2018;

WHEREAS, on August 06, 2019, the City filed proof of claim number 6-2 in the amount of Seventeen Thousand Two Hundred Two Dollars and Seventy-Eight Cents (\$17,202.78) (the “Claim”);

WHEREAS, the Claim includes two code enforcement judgments against the Debtor, in the total amount of Ten Thousand One Hundred Seventy-Three Dollars (\$10,173.00), entered in the Philadelphia Municipal Court for failing to timely file tax returns (case numbers CE-09-12-73-0852 and CE-09-12-73-1307) (the “Judgments”);

WHEREAS, subsequent to the entry of the Judgments and the preparation of the Claim, the Debtor filed the missing returns;

WHEREAS, on March 31, 2020, the Debtor asserted objections to the Claim (the “Objection”)[
[Docket No. 72];

NOW, THEREFORE, in consideration of the background set forth above and the terms and conditions of this Stipulation as more fully set forth below, the Debtor and the City (collectively referred to as the "Parties") agree to be bound and do hereby stipulate as follows:

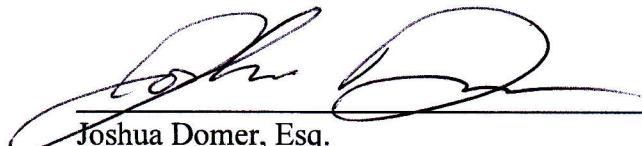
1. The Parties wish to amicably resolve the Debtor's Objection to the Claim.
2. The Parties agree the Judgments shall be reduced to One Thousand one Hundred Seventy-Three Dollars (\$1,173.00).
3. Within ten (20) days of this Stipulation receiving approval by this Honorable Court, the City shall amend its Claim to reflect the adjustment noted in paragraph 2 (the "Amended Claim").
4. Debtor's Plan shall provide for payment in full of the City's Amended Claim.
5. The terms of this Stipulation shall not be binding upon the City should this case be dismissed or converted to a case under Chapter 7 of the Bankruptcy Code.

Respectfully submitted,

Date: June 23, 2020

/s/ Joseph Vaccaro #83366
Joseph Vaccaro, Esq.
For the Debtor

Date: June 23, 2020



Joshua Domer, Esq.
Assistant City Solicitor
Attorney for the City of Philadelphia

AND NOW, this _____ day of _____, 2020, upon consideration of the Stipulation between Angie D. Valentin and the City of Philadelphia, it is hereby ORDERED that the Stipulation is approved.

HONORABLE ASHELY M. CHAN
UNITED STATES BANKRUPTCY JUDGE